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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

AUG 18 2020 *KL*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

Under Seal

v.

NOAH J. GRIMES and
KATARZYNA J. PODGORSKA

No. **20CR 513**

Violations: Title 18, United States
Code, Section 1956; Title 21, United
States Code, Sections 841(a)(1) and
846; and Title 26, United States Code,
Section 7201

JUDGE ELLIS

Magistrate Judge Jantz

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

1. Beginning in or around 2017 and continuing until in or around July
2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

NOAH J. GRIMES and
KATARZYNA J. PODGORSKA,

defendants herein, did conspire with one another, Individual A, and others known
and unknown to the Grand Jury, to knowingly and intentionally possess with intent
to distribute and distribute a controlled substance, namely, a quantity of a mixture
and substance containing a detectable amount of marihuana, a Schedule I Controlled
Substance, in violation of Title 21, United States Code, Section 841(a)(1);

All in violation of Title 21, United States Code, Section 846.

2. With respect to NOAH J. GRIMES, the offense involved 1,000 kilograms
or more of a mixture and substance containing a detectable amount of marihuana, a
Schedule I Controlled Substance.

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about February 2, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

NOAH J. GRIMES,

defendant herein, did knowingly and intentionally distribute a controlled substance,
namely, a quantity of a mixture and substance containing a detectable amount of
marihuana, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

Beginning in or around June 2015 and continuing until in or around July 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

NOAH J. GRIMES and
KATARZYNA J. PODGORSKA,

defendants herein, did knowingly conspire with one another, Individual A, and others known and unknown to the Grand Jury, to commit offenses in violation of Title 18, United States Code, Section 1956, namely, to knowingly conduct and attempt to conduct a financial transaction involving proceeds of a specified unlawful activity, namely, the felonious buying, selling and otherwise dealing in a controlled substance, knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, and that the transaction was designed in whole and in part (1) to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and (2) to avoid a transaction reporting requirement under State or Federal Law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii);

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS FOUR THROUGH SEVEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about the dates set forth below, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

NOAH J. GRIMES,

defendant herein, did knowingly conduct and cause to be conducted the financial transactions listed below, each financial transaction constituting a separate count, which financial transactions involved the proceeds of a specified unlawful activity, namely, the felonious buying, selling, and otherwise dealing in a controlled substance, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:

COUNT	DATE OF FINANCIAL TRANSACTION	FINANCIAL TRANSACTION
Four	November 30, 2015	Cash deposit of \$5,800 into Wells Fargo bank account -7102 in the name of Individual B
Five	May 10, 2016	Charge of \$4,837 on JPMorgan Chase Bank credit card -4084 in the name of Individual A to pay rent for an apartment used by GRIMES
Six	September 14, 2016	Charge of \$14,940 on American Express credit card -1008 in the name of a third party to purchase private jet service membership in the name of NOAH J. GRIMES
Seven	September 20, 2018	Transfer of \$30,000 in cash to Individual A for the down payment to purchase a vehicle used by GRIMES

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNTS EIGHT THROUGH TEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about the dates set forth below, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

NOAH J. GRIMES and
KATARZYNA J. PODGORSKA,

defendants herein, did knowingly conduct and cause to be conducted the financial transactions listed below, each financial transaction constituting a separate count, which financial transactions involved the proceeds of a specified unlawful activity, namely, the felonious buying, selling, and otherwise dealing in a controlled substance, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:

COUNT	DATE OF FINANCIAL TRANSACTION	FINANCIAL TRANSACTION
Eight	January 12, 2017	\$3,500 payment to Discover credit card account -6738 in the name of NOAH J. GRIMES funded by PNC Bank checking account -3111 in the name of KATARZYNA J. PODGORSKA
Nine	September 29, 2017	Rent payment of \$6,300 made via cashier's check identifying KATARZYNA J. PODGORSKA as remitter for the property located at 3353 N. Albany Avenue, Chicago, Illinois
Ten	October 14, 2017	Charge of \$4,633 on Chase Bank credit card account ending -7451 in the name of KATARZYNA J. PODGORSKA to pay for transportation services

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT ELEVEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

Beginning in or around 2014 and continuing until in or around 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

NOAH J. GRIMES,

defendant herein, did willfully attempt to evade and defeat the payment of income tax due and owing to the United States of America for calendar years 2014, 2015, 2016, 2017, and 2018, and committed the following affirmative acts of evasion, in order to conceal his income from and avoid reporting his income to the Internal Revenue Service:

(a) Beginning in or around August 2014, GRIMES retained the services of a professional accountant to prepare his individual income tax returns (Form 1040) for tax years 2012 and 2013. The returns prepared by the accountant reflected that GRIMES received income in each of those tax years and that taxes were due and owing for tax years 2012 and 2013. GRIMES did not file the returns with the Internal Revenue Service or report taxable income to the Internal Revenue Service for tax years 2012 or 2013 or for any of the years alleged in this Count, or pay personal income taxes for tax years 2012 or 2013 or for any of the years alleged in this Count.

(b) Beginning in or around 2014 and continuing until in or around 2016, GRIMES deposited and caused to be deposited into bank accounts held in the name of his brother income generated from the illegal sale of marihuana and other sources

of income, and caused money to be disbursed from these accounts in order to pay his personal expenses.

(c) Beginning in or around 2014 and continuing until in or around 2018, GRIMES leased apartment units located at 1555 N. Vine Street and 1600 N. Vine Street in Los Angeles, California, and at 1350 N. Wells Street in Chicago, Illinois, in the name of his brother by fraudulently using his brother's identifying information and providing false information in lease applications; used the apartments for his personal benefit; and made and caused to be made lease payments using income generated from the illegal sale of marihuana and other sources of income.

(d) Beginning in or around November 2014 and continuing until in or around January 2016, GRIMES deposited and caused to be deposited into bank accounts held in the name of Individual B income generated from the illegal sale of marihuana and other sources of income, and caused money to be disbursed from these accounts in order to pay his personal expenses.

(e) Beginning in or around March 2016 and continuing until in or around May 2017, GRIMES caused Individual A to lease commercial warehouse space in Individual A's name located at 3216 W. Augusta Boulevard in Chicago, Illinois; used the warehouse space for his own benefit; and reimbursed Individual A for lease payments using income generated from the illegal sale of marihuana and other sources of income.

(f) Beginning in or around June 2015 and continuing until in or around September 2018, GRIMES caused Individual A to lease a 2015 white Maserati

automobile in Individual A's name; used the Maserati for his own benefit; and reimbursed Individual A for lease payments using income generated from the illegal sale of marihuana and other sources of income.

(g) Beginning in or around May 2016 and continuing until in or around July 2017, GRIMES (i) caused Individual A to open a Chase credit card account in Individual A's name; (ii) used the credit card to pay for his personal expenses; and (iii) reimbursed Individual A for use of the credit card account using income generated from the illegal sale of marihuana and other sources of income.

(h) Beginning in or around July 2017 and continuing until in or around August 2018, GRIMES caused Individual C to lease an apartment unit in Individual C's name located at 1350 N. Wells Street in Chicago, Illinois, by providing and causing to be provided false information in Individual C's lease application; used the apartment unit for his own benefit; and reimbursed Individual C for lease payments using income generated from the illegal sale of marihuana and other sources of income.

(i) Beginning in or around November 2018 and continuing until in or around May 2019, GRIMES caused Individual A to finance the purchase of a 2015 black Maserati automobile by obtaining a loan for the vehicle in Individual A's name; used the Maserati for his own benefit; and reimbursed Individual A for the down payment and vehicle loan payments using income generated from the illegal sale of marihuana and other sources of income.

In violation of Title 26, United States Code, Section 7201.

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in this indictment, defendants shall forfeit to the United States of America any property involved in such offense, and any property traceable to such property, as provided in Title 18, United States Code, Section 982(a)(1).

2. As to defendant NOAH J. GRIMES, the property to be forfeited includes, but is not limited to, a personal money judgment in the amount of approximately \$1,552,612.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided by Title 21, United States Code Section 853(p) and Title 18, United States Code, Section 982(b)(2).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY